May 15, 2015

Katrina Higgins-Coltrain Remedial Project Manager US EPA Region 6 LA/OK/NM Section

In preparation for the Community Meeting next, I would like to summarize our support for actions taken by EPA and those proposed for the Wilcox Oil Company Superfund Site, Creek County, OK.

After reviewing the Hazard Ranking System (HRS) package and supporting documents the primary concern are the lead concentrations identified in surface soils, especially the extremely high levels in several locations.

Exposure to high concentrations of lead in soil is a health concern for residents, especially children and pregnant women, currently living at residential properties that exist on the site. To fully evaluate site-specific exposure and the risk of health effects for individuals exposed to lead and other contaminants that may be present, additional characterization of the surface soil that people may come in contact with is needed. ATSDR continues to support EPA's ongoing efforts to characterize the site and provide educational information to residents aimed at reducing potential exposures.

Based on the initial review of the HRS package, ATSDR is concerned about possible lead exposures, especially to onsite residents and their children. In this regard we have:

- 1. Communicated with the EPA On-Scene-Coordinator (OSC) and discussed soil sampling being conducted around a residential area where the residential owner had expressed concern about their child being exposed to lead. Previous sampling of this property had not indicated levels of concern although they were of a limited nature. There are remote areas of this property where there is much higher lead contamination at depth.
- 2. Reviewed initial data, shared by EPA, on the soil lead concentrations from one of the onsite residential properties. There were lead exceedances at 2-6 inches (906 mg/kg) and 6-2 inches (5850 mg/kg) in one of the grid samples. The owner has been notified.
- 3. Received and reviewed the map and sampling data collected in the other grids on the resident's property. Only the initial identified grid indicated elevated concentrations of lead at depth. ATSDR has reviewed the soil lead sampling results reported and discussed the results with EPA.
- 4. Provided the attached copy of the "Lead Facts For WILCOX Resident" to help educate the occupants of the home sampled and for others as needed.
- 5. Been informed that ODEQ met with the EPA RPM to discuss plans to meet with the residents living on site and offer to do soil sampling of their property.





- 6. Been briefed on the actions to receive access agreements for nine properties identified for grid sampling on or near the Wilcox Site and the depth and contaminants to be sampled for.
- 7. Informed that at this time subsurface lead contamination will be addressed during the remedial phase. The option to install fencing around lead contaminated areas will be considered as those locations were identified.
- 8. Informed that sampling activities are planned to be initiate during the week of May 11. Fence installation on areas identified is also planned. ATSDR RO6 will be available to review sampling results. Depending on the residential lead sampling results, there may be a need to recommend blood lead testing for children that might be impacted.
- 9. Invited and will attend and participate in the Community Meeting scheduled for May 19th.

We appreciate the opportunity to work with you on this site and your efforts to continue to address concerns raised by the community.

George I. Pettigrew

Regional Director

Division of Community Health Investigations

Central Branch Agency for Toxic Substances and Disease Registry - Region 6

Pettigrew, George

From:

Pettigrew, George

Sent: Thursday, January 22, 2015 10:28 AM

To: John Meyer Cc: Hayes, Mark

Subject: Lead Facts - For WILCOX Resident

LEAD FACTS

• Pregnant women, women of child bearing age, and children less than six years of age are at greatest risk for health effects from lead exposure.

- In May 2012, the Centers for Disease Control and Prevention (CDC) updated its recommendations on children's blood lead levels. By shifting the focus to primary prevention of lead exposure, CDC wants to reduce or eliminate dangerous lead sources in children's environments BEFORE they are exposed.
- If elevated blood levels are found, more informed decisions can be made with health care providers on whether to increase the frequency of blood lead testing or the need for other testing such as for nutritional deficiencies.
- Lead poisoning is preventable.
 - Lead poisoning occurs with no obvious symptoms, frequently goes unrecognized, and can affect nearly every system in the body.
 - o If left unchecked, very high or elevated blood levels can result in brain and nervous system damage.
- Children can get lead in soil into their bodies by putting their hands or toys with dirt on them in their mouths.
 - O Children under the age of six years are at the greatest risk for lead poisoning.
 - o Their brain and nervous systems are still undergoing development.
 - High levels or elevated blood levels can lead to slow growth as well as behavior and learning problems.
- Pregnant women should avoid lead exposure.
 - Lead can easily cross the placenta and may be very harmful to your unborn child.
- In May 2012, the Centers for Disease Control and Prevention (CDC) updated its recommendations on children's blood lead levels.
- By shifting the focus to primary prevention of lead exposure, CDC wants to reduce or eliminate dangerous lead sources in children's environments BEFORE they are exposed.
- CDC and ATSDR recommend reducing lead exposure wherever possible because there is no proven safe level of lead in the blood and recommends ways you and your family can prevent lead exposure:
 - Wash children's hands and feet after they have been playing outside and especially before eating
 - Watch children to identify any hand-to-mouth behavior or excessive intentional dirt eating these behaviors should be modified or eliminated
 - o Wash children's toys regularly
 - Wipe shoes on doormat or remove them before going inside
 - Damp/wet mop floors and damp dust counters and furniture regularly
 - Change and launder any dirty clothes after playing outside
 - Frequently bathe your pets to prevent tracking of contaminated soil into your home.

- O Cover bare soil with vegetation (grass, mulch, etc.) to avoid contact or adding a layer of clean soil over existing soil
- o Create a raised bed and fill with clean soil for gardening to reduce exposures from gardening and digging. Rinse produce well to remove garden soil
- o Create safe play areas for children with appropriate and clean ground covers
 - Sand boxes for children that like to dig
 - Raised bed and fill for gardening to reduce exposure
- Provide a healthy diet for your child that is rich in iron, calcium and vitamin C based on dietary consumption guidelines that are age appropriate to reduce lead absorption.

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